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14
15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION**

17 In re: Shimano Crankset Litigation

Case No. 8:23-cv-02038-JVS (JDEx)

18
19 **JOINT REPORT OF ALL PARTIES**
20 **REGARDING THE STATUS OF**
21 **SETTLEMENT AND REQUEST TO**
22 **PARTIALLY LIFT TEMPORARY**
23 **STAY**

24 Judge: Hon. James V. Selna
Courtroom 10C

Pursuant to the Court’s order dated April 1, 2025, Plaintiffs Steven Adelman, Jose Delgado, Jose Erazo, Dave Gonyer, Jarett Hawkins, Christopher Jennings, Moussa Kouyate, Marcus Lewis, Kevin Litam, Maurice Scorsolini, Dimitri Semizarov, and Mike Tirado (“Plaintiffs”), together with Defendants Shimano North America Bicycle, Inc., Shimano North America Holding, Inc., Specialized Bicycle Components, Inc., Trek Bicycle Corporation, and Giant Bicycle, Inc. (“Defendants”) (collectively with Plaintiffs, the “Parties”), respectfully submit the following joint report regarding the status of settlement efforts.

Since the Parties last submitted a joint report, the Parties have finalized and executed a settlement agreement. Per its terms, Shimano North America Bicycle, Inc. and Shimano North America Holding, Inc. (“Shimano”) submitted relevant portions of the agreement to the U.S. Consumer Product Safety Commission (“CPSC”) for the agency’s review and approval. The CPSC approved those materials on May 12, 2025.

On May 22, 2025, the Court granted counsel’s motion to withdraw as counsel for Mr. Sielski. Dkt. No. 120.

Following the CPSC’s approval, the settlement agreement calls for Plaintiffs to file a Second Amended Complaint and a motion for preliminary approval of the settlement. Plaintiffs anticipate filing the Second Amended Complaint no later than June 6, 2025. The Parties are also working to engage a settlement administrator. Plaintiffs anticipate filing a motion for preliminary approval no later than June 30, 2025.

Accordingly, the Parties respectfully request that the Court lift the stay to the extent necessary to allow Plaintiffs to file a Second Amended Complaint; to allow Plaintiffs to file a motion for preliminary approval; and to allow all filings and other steps necessary or appropriate to provide notice to the Settlement Class, to enable the Court to review and, if appropriate, to approve the settlement, and to

1 facilitate the settlement, including motions to certify the Settlement Class, to
2 appoint counsel for the Settlement Class, and to approve Class Representatives for
3 the Settlement Class. The stay shall remain in effect with respect to matters not
4 necessary to obtain approval of or to facilitate the settlement. For instance, the
5 stay, so long as it remains in effect, shall relieve Defendants of any obligation to
6 respond to the Second Amended Complaint.

7 A Proposed Order regarding this request is submitted concurrently
8 herewith, for the Court's consideration.

9
10 Date: May 30, 2025

By: /s/ David Fernandes

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FILER'S ATTESTATION

Pursuant to L.R. 5-4.3.4(a)(2), I certify that all other signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

By: /s/ Benjamin G. Barokh

Benjamin G. Barokh